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October 30, 2000

Mr. David Waddell, Executive Secretary  
Tennessee Regulatory Authority  
460 James Robertson Parkway  
Nashville, Tennessee 37245

00-00971

Dear Mr. Waddell:

This is to request that the TRA take formal expedited action and order BellSouth to take immediate steps to correct network and database deficiencies regarding Calling Name Service for AT&T Local Service Customers including a large department store that recently converted to AT&T Local. AT&T requests the TRA order BellSouth to provide AT&T such documentation as necessary in order to inform customers that BellSouth is correcting the problem and that BellSouth does not intend to use this problem to winback customers to BellSouth.

AT&T Local Service (ALS) recently competed for and won from BellSouth the local service business of a large multi-state department store, including its locations in Tennessee. AT&T successfully made the necessary network conversions to switch the department store to ALS service in Tennessee. After conversion to ALS, the department store informed ALS that some customer's Caller ID was not displaying "the department store's name" when the department store called their customers as was the case before conversion from BellSouth to ALS. Rather "Nashville, TN", for example, is displayed as the calling party. It is very important to the department store that its name is displayed on the customer's Caller ID.

Documentation of this issue in the form of e-mail correspondence from Denise Berger, AT&T, to Jan Burriss, BellSouth; from Garry Sharp to Eddie Roberson at the TRA; and Mr. Roberson's response is attached.

As additional background, ALS worked with its internal engineers, as well as with Illuminet, AT&T's SS7 provider, to eliminate any ALS-caused problem with the delivery of this service. Further investigation found that the problem exists for any CLEC that port numbers from BellSouth, but does not subscribe to BellSouth's CNAM database service. BellSouth does not follow the current industry standards that require a 10-digit Global Title Translation (GTT) dip. Instead, BellSouth only does a 6-digit dip. BellSouth has determined that a software upgrade is necessary to bring them in line with



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industry standards. However, BellSouth does not plan to implement this upgrade until 2001, phasing in the fix from mid-second quarter through mid-fourth quarter.

BellSouth has offered AT&T an interim solution of having AT&T load the AT&T CNAM information into BellSouth's data base. However, even if this interim solution is successful for a single customer, the time and cost of the repeated interim solutions and the potential impact on subsequent competitive opportunities continues BellSouth's monopoly advantage. Formal expedited action is necessary because the department store has indicated to AT&T that if this problem is not corrected then the department store intends to change its local service back to BellSouth. BellSouth's delay until sometime next year continues their local monopoly advantage over competitors and denies consumers the opportunity to receive competitive alternatives simply because BellSouth has not acted.

AT&T further believes that BellSouth is in violation of the FCC's local number portability (LNP) order by performing only 6-digit GTT for CNAM. The FCC LNP order mandates that all carriers will comply with LNP rules and guidelines set forth by industry bodies such as the LNP Work Group, the Industry Number Committee, and the North American Numbering Council. In the "Generic Requirement for SCP Application and GTT Function for Number Portability", Section 4.3 indicates that a 10-digit GTT must be performed for CNAM when the 6-digit number is ported.

AT&T requests the TRA to take such formal expedited action as necessary to order BellSouth to remedy this problem immediately and to order BellSouth to provide such documentation as necessary in order to inform customers that BellSouth is correcting the problem and that BellSouth does not intend to use this problem to winback customers for BellSouth.

Sincerely,

  
Garry Sharp

cc: Guy Hicks, BellSouth

## Sharp,Garry - LGA

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**From:** Eddie Roberson [eroberson@mail.state.tn.us]  
**Sent:** Monday, October 16, 2000 4:23 PM  
**To:** glsharp@att.com  
**Cc:** Lewis DeBoard  
**Subject:** Re: FW: Caller ID Issue for [REDACTED] Department Stores

Garry,

Glad to hear you are doing fine and able to be back at work. You will detect, as I have been told, improvement every day.

Concerning your Call ID complaint, we have heard this complaint from X and O (Nextlink) as well. BellSouth has told us that they are working on the technical problem and should have it repaired when they install 3.0 version in their switches shortly after the first of the year. We understand this is a problem due to BellSouth not being able to conduct a 10 digit query on ported numbers. All states in the BellSouth region are having this trouble.

De is more familiar with this problem and I have asked him to discuss with BellSouth again the problem and get an update. He will call you when he has additional information.

Eddie

>>> "Sharp,Garry - LGA" <glsharp@att.com> 10/16/00 11:27AM >>>  
Eddie,

I would appreciate your help with BellSouth to resolve the caller id problem described in the e-mail below. We asked for an answer from BellSouth by 10/20 but since this is an important customer for our local service I believe your assistance would be of help to us.

Thanks,

Garry

-----Original Message-----

**From:** deberger@att.com [mailto:deberger@att.com]  
**Sent:** Monday, October 16, 2000 11:21 AM  
**To:** glsharp@att.com  
**Cc:** cvwallace@att.com  
**Subject:** FW: Caller ID Issue for [REDACTED] Department Stores  
**Importance:** High

Garry,

Please see the attached message that was delivered to the BellSouth Account Team on Friday evening.

As you can see, this customer is being penalized for choosing AT&T as his local service supplier. This is a large customer for AT&T, who is very unhappy at this time. It seems that BellSouth is providing a service to BellSouth customers that they refuse to provide to competitor's customers. When [REDACTED] calls an AT&T-supplied local service user, the calling party information is delivered fine. BellSouth, however, is not passing the information along to BellSouth-supplied local service users.

Please ask the TRA to assist us in quickly resolving this issue. Our customer cannot be competitively disadvantaged this way, particularly when there is nothing that is in AT&T's span of control that will correct the problem.

Thanks much.

Denise C. Berger  
District Manager-Local Supplier Performance  
404/810-8644 (Voice)  
404/810-8605 (Fax)

800 258-0000, PIN #2589558 (Pager)  
deberger@att.com

> -----Original Message-----

> From: Berger, Denise C, NCAM  
> Sent: Friday, October 13, 2000 7:02 PM  
> To: BST-Jan Burriss (E-mail)  
> Cc: BST-Bob Bickerstaff (E-mail)  
> Subject: Caller ID Issue for [REDACTED] Department Stores  
> Importance: High

> October 13, 2000

> Jan Burriss  
> BellSouth Telecommunications, Inc.  
> 1960 West Exchange Place  
> Suite 200  
> Tucker, Georgia 30084

> RE: Caller ID Issue for [REDACTED] Department Stores

> Dear Jan:

> AT&T has a very upset customer and I'm hopeful that you can help me  
> satisfy him. AT&T successfully ported the telephone numbers for the store  
> in Nashville, Tennessee in early September. We have also ported the  
> stores in Miami and Orlando, Florida, and suspect that we'll have the same  
> problem there. [REDACTED] has occasion to call their customers for various  
> reasons. Before they ported their numbers to AT&T, they were able to call  
> their customers, and, if their customers had Caller ID, the name  
> "[REDACTED]" and the store phone number was displayed on the Caller ID  
> unit. The called parties are BellSouth local service customers.

> Since the port, the information on the Caller ID unit is only displayed as  
> "Nashville, TN" and the phone number. [REDACTED] is not happy about this.

> At first, AT&T thought that this was a problem with our SS7 provider,  
> Illuminet, since the customer had always gotten the information before.  
> During our troubleshooting, we could find no problem with Illuminet nor  
> with the AT&T network. Illuminet agreed to check the situation with their  
> BellSouth network contacts and came back to us this morning with a very  
> disturbing response: that, as a matter of policy, BellSouth does not do a  
> 10-digit look-up for ported numbers. Apparently, BellSouth has decided to  
> only display city, state and number on ported numbers.

> If this is indeed the BellSouth policy, why would BellSouth deliver the  
> customer's name and number for BellSouth retail services and not for CLEC  
> services?

> The BTN for the Nashville store is 615/[REDACTED]. We have done some  
> experimenting. When [REDACTED] calls a location served by AT&T local  
> service, the Caller ID display correctly shows "[REDACTED]" and the phone  
> number. Only when they call a location served by BellSouth do they have a  
> problem.

> Please let me know by Friday, October 20, what we can do to solve this  
> customer's problem.

> Thanks for your assistance.

> Sincerely,

> Denise C. Berger  
> District Manager-Local Supplier Performance  
> 404/810-8644 (Voice)  
> 404/810-8605 (Fax)  
> 800 258-0000, PIN #2589558 (Pager)  
> deberger@att.com